

REMARKS/ARGUMENTS

Applicants thank the Examiner for his careful review of this application. Claims 1, 3-6, 8, 10-14, and 16-19 have been rejected. Claims 1, 3, 6, 8, 12, 13, 14, 16, and 19 have been amended. Applicants respectfully request reconsideration of the application in view of the above amendments and the following remarks submitted in support thereof.

Obviousness Rejections under 35 U.S.C. §103(a)

Pending claims 1, 3-6, 8, 10-14, and 16-19 stand rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,463,498 to Wakeley et al. in view of U.S. Patent No. 5,954,796 to McCarty et al. As will be fully explained below, the combination of Wakeley et al. in view of McCarty et al. does not raise a *prima facie* case of obviousness against amended independent claims 1, 8, and 14.

Although the Applicants believe that the original pending claims are defined over the prior art of record, the Applicants have amended claims 1, 3, 6, 8, 12, 13, 14, 16, and 19 to clarify that a port target identifier is SCSI based. As a result, independent claims 1, 8, and 14 define a method, a system, and a computer program for constructing an address database including a device entry that associates an Arbitrated Loop Physical Address (AL_PA) with the SCSI port target identifier and a logical unit identifier. In addition, the address database facilitates translation of operating system independent commands received by a Fibre Channel wrapper module into Fibre Channel commands usable by a Fibre Channel layer module that is in communication with a Fibre Channel controller.

In response to the Applicants' argument, the Examiner noted that Wakeley et al. teach the association of the AL_PA with the port target identifier and the logical unit identifier because "AL_PA corresponds to the FC Port specification within the D_ID and S_ID" (see

Office Action mailed March 2, 2004 at page 9). Applicants respectfully traverse the Examiner's characterization of Wakeley et al. relative to amended independent claims 1, 8, and 14 because the portion of the reference relied upon by the Examiner (col. 18, lines 38-67) does not teach or suggest associating the AL_PA with the SCSI port target identifier and the logical unit identifier, as defined in amended independent claims 1, 8, and 14. In particular, at column 6, lines 61-66, Wakeley et al. disclose that the D_ID is an "FC address indicating the destination FC Port for the frame," and the S_ID is an "address that indicates the FC Port that transmitted the frame." As such, Wakeley et al. teach that the D_ID and the S_ID are FC addresses. Even the Examiner admitted that "[b]oth the D_ID (destinatin) [*sic*] and the S_ID(source) that specify a fabric address for a particular FC Port" (see Office Action mailed March 2, 2004 at page 9). In contrast, amended independent claims 1, 8, and 14 define the port target identifier to be SCSI based. As Wakeley et al. disclose FC addresses that are not based on SCSI, Wakeley et al. cannot reasonably be considered to teach or suggest a device entry that associates an Arbitrated Loop Physical Address (AL_PA) with the SCSI port target identifier and the logical unit identifier, as defined in amended independent claims 1, 8, and 14.

Furthermore, the Examiner also noted that Wakeley et al. teach the address database that facilitates the translation of operating system independent commands received by the Fibre Channel wrapper module into Fibre Channel commands. Applicants respectfully traverse the Examiner's characterization of Wakeley et al. relative to amended independent claims 1, 8, and 14 because the portion of the reference relied upon by the Examiner (Figure 3 and column 4, lines 42-51) does not teach or suggest the address database that facilitates translation of operating system independent commands received by the Fibre Channel wrapper module into Fibre Channel commands, as defined in amended independent claims 1,

8, and 14. Specifically, column 4, lines 42-51 merely discloses the functions of an FC Port. For example, “[t]he FC Port includes serial transmitter and receiver components coupled to a communications medium via a link that comprises electrical wires or optical strands” (col. 4, lines 48-51). The components and functions of the FC Port are not relevant and have nothing to do with the address database that facilitates translation of operating system independent commands received by the Fibre Channel wrapper module into Fibre Channel commands, as defined in amended independent claims 1, 8, and 14.

The Examiner also referred to item 3 of Figure 3 in support of the 35 U.S.C. §103(a) rejection. Here, Figure 3 merely shows the details of an FC frame. The FCP_LUN filed 330 is an address that is located in a data payload section 308. The data payload “contains the actual data packaged within the FC frame” (col. 7, lines 6-7). As such, Figure 3 teaches the packaging of SCSI data and commands, like FCP_LUN, FCP_CMND, etc., within the FCP frame. In contrast, independent claims 1, 8, and 14 teaches an address database that facilitates translation of operating system independent commands received by the Fibre Channel wrapper module into Fibre Channel commands. The FC frame disclosed in Wakeley et al. only packages SCSI data and commands and does not facilitate translation in any manner. Accordingly, Wakeley et al. cannot reasonably be considered to teach or suggest the address database that facilitates translation of operating system independent commands received by the Fibre Channel wrapper module into Fibre Channel commands, as defined in independent claims 1, 8, and 14.

To establish a *prima facie* case of obviousness, the prior art references must teach or suggest all the claim limitations (see M.P.E.P. §2143). Here, in view of the incorrect characterization of Wakeley et al., the references as combined do not teach all the features of the claimed invention. Since dependent claims 3-6, 10-13, and 16-19 directly or indirectly

depend from amended independent claims 1, 8, and 14. Applicants submit that the dependent claims are patentable under 35 U.S.C. §103(a) for the reasons set forth above. As a result, Applicants respectfully request the Examiner to withdraw the 35 U.S.C. §103(a) rejection for pending claims 1, 3-6, 8, 10-14, and 16-19.

Conclusion

In view of the foregoing, the Applicants respectfully submit that all the pending claims 1, 3-6, 8, 10-14, and 16-19 are in condition for allowance. Accordingly, a Notice of Allowance is respectfully requested. If the Examiner has any questions concerning the present Amendment, the Examiner is requested to contact the undersigned at (408) 749-6900 ext. 6924. If any additional fees are due in connection with filing this Amendment, the Commissioner is also authorized to charge Deposit Account No. 50-0805 (Order No. ADAPP171). A duplicate copy of the transmittal is enclosed for this purpose.

Respectfully submitted,
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